

To: The Federal Communications Commission

**From: Mark E. Bohach and Arlene D. Bohach- Partners
WLOH Radio Company- licensee of WLOH (AM) Lancaster, Ohio**

Date: April 30th 2019

**Subject: Comments regarding RM-11836
Petition for Rulemaking to Allow the MA3 All-Digital Mode of HD Radio for AM Stations**

Thank you for the opportunity to comment on this rulemaking.

We wish to express our support for RM-11836 and express our sincere thanks to the FCC for their consideration of this matter.

For background, we were commenters on the original petition for rulemaking to allow FM translator usage by AM stations. Our comments were cited in the 2009 rulemaking and we were an early adopter of FM Translator service in 2010. This gave us a tremendous head start toward what eventually became the AM Revitalization effort and we can confidently report that the vast majority of listeners now access WLOH via our FM Translators.

As the operators of an AM radio station in a smaller market, we are grateful for the AM Revitalization efforts thus far put forth by the FCC. The ability to utilize the FM Translator service has allowed us to stabilize our operations and provide reliable vital services to our community 24 hours per day.

The MA3 Digital option presented in this rulemaking would allow stations such as ours flexibility to put our AMs back at the forefront of technology. Not only would it give us the ability to dramatically improve the audio quality of our AM signal but it would also give us a powerful promotional tool to attract and retain listeners.

We understand that this would require a significant financial investment in the technology to make it happen. We believe that this is the only way to spur any investment in AM as most stations we are familiar with are simply in maintenance mode (at best).

While not specifically addressed in RM-11836, we believe it is also time to 'thin the herd' of AM signals. There are many small AM stations that have been effectively replaced by their FM translator. As part of this rulemaking, we also want to see an option where smaller AM operators that can prove that their FM Translator now covers their entire community of license with at least -60 dBu could turn off their AM signal and continue to operate their FM Translator as a protected signal.

Once a sufficient number of smaller signals were removed, larger AM stations would have the ability to increase power (especially at night) and with the implementation of MA3 get back to their original AM service contours.